

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Billie Sebastian BELLO-Bello

Case No.

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 30, 2018 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

21 U.S.C. 952(a) and 963

*Offense Description*

The defendant did knowingly and unlawfully import into the United States from The United Mexican States a controlled substance listed under Schedule II of the Controlled Substance Act, to wit; approximately 19.24 kilograms of cocaine. Furthermore, the defendants did knowingly and unlawfully conspire to unlawfully import the above listed cocaine.

This criminal complaint is based on these facts:

See Attachment A.

☒ Continued on the attached sheet./s/ Shawn Landsman*Complainant's signature*Shawn Landsman, HSI Special Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: 10/02/2018*Judge's signature*City and state: Laredo, TexasDiana Song Quiroga, U.S. Magistrate Judge*Printed name and title*

Attachment "A"

I, Shawn Landsman, a Special Agent with Homeland Security Investigations, have knowledge of the following facts:

1. On September 30, 2018, Billie Sebastian BELLO-Bello applied for entry into the United States from the United States of Mexico at the Gateway to the Americas Port of Entry in Laredo, Texas. BELLO was operating a 2006 Mercedes Benz SUV, bearing Texas plates. BELLO was the vehicle's only occupant.
2. Customs and Border Protection Officers (CBPOs) referred BELLO for secondary inspection.
3. CBPOs examined BELLO's Mercedes Benz SUV. CBPOs seized from the driver side floorboard a total of 18 bundles containing a white substance. The 18 bundles weighed 19.24 kilograms and field tested positive for cocaine.
4. Homeland Security Investigations (HSI) Special Agents (SAs) read BELLO his Miranda Rights in the English language, to which BELLO waived and agreed to speak to agents.
5. BELLO stated that on September 29th he traveled from Manor, Texas to Monterrey, Mexico to attend his great-grandfather's 101st birthday party. BELLO stated he had sent family photos from the party to his sister. Agents spoke to BELLO's sister. She told agents she had not received any such photos. BELLO stated he purchased the Mercedes Benz SUV approximately 4-5 months ago from an individual on Craigslist for \$4,000 USD. He stated he had recently registered the vehicle and insured the vehicle in the last couple of days. BELLO stated his father had been working on the vehicle for him, because there was something wrong with it. Agents spoke to BELLO's father, He told agents he had not done any work on a Black SUV for his son.
6. HSI Laredo Special Agents placed BELLO under arrest for federal narcotics violations.